## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA ERIE DIVISION

UNITED STATES OF AMERICA, ex rel.	)	
DILBAGH SINGH, M.D., PAUL KIRSCH, M.D.,	)	
V. RAO NADELLA, M.D., and	)	
MARTIN JACOBS, M.D.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION NO. 04-186E
	)	
V.	)	
	)	
	)	
BRADFORD REGIONAL MEDICAL CENTER,	)	Judge Cohill
V & S MEDICAL ASSOCIATES, LLC,	)	
PETER VACCARO, M.D.,	)	
KAMRAN SALEH, M.D.,	)	
and DOES I through XX,	)	
	)	
	)	
Defendants.	)	

## MOTION TO EXTEND TIME TO RESPOND TO DEFENDANTS' JOINT MOTION TO DISMISS

AND NOW, come the Plaintiffs/ Relators by and through their undersigned counsel and request this Honorable Court to enter an Order granting an extension until October 10<sup>th</sup>, 2005 to respond to Defendants' Joint Motion to Dismiss.

- 1. On August 25, 2005, Defendants filed and served on Plaintiffs' counsel their Joint Motion to Dismiss and supporting Memorandum.
- 2. The undersigned have contacted Defendants' counsel with regard the within motion. Defendants' counsel have indicated that they have no objection to an extension until October 10, 2005.

WHEREFORE, the undersigned respectfully request that this Honorable Court grant Plaintiffs' request to extend the time to respond to the Joint Motion to Dismiss.

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This 31st day of August, 2005.

Respectfully submitted,

By: /S/ Andrew M. Stone Andrew M. Stone, Esquire (Pa. #35176) STONE & STONE 828 Frick Bldg. 437 Grant Street. Pittsburgh, Pa. 15219 Phone: (412) 391-2005 Fax: (412) 391-0853

By: /S/ G. Mark Simpson G. Mark Simpson Georgia Bar No. 647725 Bothwell & Simpson, P.C. 304 Macy Drive Roswell, GA 30076 (770) 643-1606

Attorneys for the Plaintiffs/Relators

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and DOES I through XX,	)	
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Defendants.	)	

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 31st day of August, 2005, I caused a copy of the Plaintiffs' Motion to Extend Time and proposed order, to be filed electronically and/ or served by first-class mail, postage prepaid, on:

Jay D. Marinstein, Esq.	Robert L. Eberhardt, Esq.
Carl J. Rychcik, Esq.	United States Attorney's Office
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Daniel M. Mulholland III, Esq.	Michael Granston, Esq.
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/S/ Andrew M. Stone